

**Hogan
Lovells**

MEMO ENDORSED

Hogan Lovells US LLP
390 Madison Avenue
New York, NY 10017
T +1 212 918 3000
F +1 212 918 3100
www.hoganlovells.com

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 7/9/2020

July 9, 2020

VIA ECF

Hon. Valerie Caproni
United States District Court for the Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Donoghue, et al. v. National Health Investors, Inc., et al.*
S.D.N.Y. Docket No. 1:20-cv-03697-VC
Joint Request to: (1) Extend Time to Respond to the Complaint; and
(2) Adjourn the Initial Conference

Dear Judge Caproni:

This firm represents defendant Eric L. Mendelsohn ("Mr. Mendelsohn") in the above-referenced action.

We, along with counsel for nominal defendant National Health Investors, Inc. ("NHI"), write to jointly request that the time for Mr. Mendelsohn and NHI to respond to the Complaint be extended by thirty (30) days, from July 13, 2020 to August 12, 2020. Counsel for plaintiffs Deborah Donoghue and Mark Rubenstein (together, "Plaintiffs") consent to the requested extension. We are seeking an extension in order to provide time for counsel to review and analyze the issues and prepare a response. No prior requests to extend Mr. Mendelsohn's and NHI's time to respond to the Complaint have been made.

We, together with NHI's counsel and Plaintiffs' counsel, also write to jointly request an adjournment of the initial conference that is currently scheduled for July 24, 2020. All parties consent to, and join in, this request and propose September 25, 2020 and October 2, 2020 as alternative dates. This is the parties' second request to adjourn the initial conference – the conference was previously adjourned from June 26, 2020 to July 24, 2020.

Respectfully yours,
/s/ Robin L. Muir
Robin L. Muir

Senior Associate
robin.muir@hoganlovells.com
D 212 918 3264

cc: All counsel of record
via ECF

Application GRANTED. Defendants' time to respond to the complaint is extended to **August 12, 2020**. The pretrial conference currently scheduled for July 24, 2020 is adjourned to **September 25, 2020 at 10:00 a.m.**

SO ORDERED.

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

7/9/2020